Danner, Ward

From: Wilson, Patrick
Sent: Thursday, December 19, 2013 4:04 PM
To: Jennifer deNicola
Cc: Lyon, Sandra; elaine@erwdesign.com; Armann, Steve; Cota, Thomas@DTSC (Thomas.Cota@dtsc.ca.gov)
Subject: Malibu High School PCB Question/Answers

Good Afternoon Jennifer & Elaine,

Steve Armann shared the message captured below & asked me to reply to your questions. Please don't hesitate to contact me directly if we can offer additional clarifications. Our responses are captured in blue font.

Best Regards…

..patrick

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United States Environmental Protection Agency

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Elaine:

I just want to make it clear that what I did was put in "my own words" a brief summary for parents, not transcribe the study session. I did this so parents who have not watched the study session could see a glimpse of what was said. These are parent questions and I want the parents to see the answers to their questions.

Just wanted to clear that up.
Thanks,
Jen

On Dec 18, 2013, at 4:34 PM, Elaine Rene-Weissman wrote:

Hello All,

Jennifer transcribed the Q+A portion of the Board of Ed study session.

Below are my comments, in blue.

2:00:45 EPA: Dust samples need to come down. Good cleaning is needed before long term plan is implemented. **WHAT ARE ACCEPTABLE REDUCTION LEVELS?**

EPA would prefer that all wipe sample results remain below 10 ug/100 cm2. However, this is a regulatory level or trigger under the Toxic Substances Control Act (TSCA) rather than a health or risk-based guideline similar in nature to the health-based guideline that we have developed for air.

2:02:00 EPA: After school cleaning EPA will do a verification sample post clean-up.
WILL THIS BE A HEPA CLEANING OR DEEP CLEANING OR BOTH?

It is our current understanding that the cleaning will consist of vacuuming with a HEPA filter & wiping down impacted surfaces with a wet cloth. This approach is consistent with our "Best Management Practices". Cleaning of the ventilation system should also be included.

Steve A: EPA fully intends to look for other PCB sources **WHAT IS THE TIMETABLE?**

EPA will require a visual inspection of selected rooms to determine if additional sources of PCBs exist. However, should air sampling results continue to remain below our health-based guidelines, then it is probably not necessary to remove other sources. If the findings from additional air samples exceed EPA's health-based guidelines for air, then evaluation & mitigation of the other sources of PCBs will be necessary. EPA has committed to reviewing & turning around any remediation plans submitted by the district within one calendar week.

2:22:25 Should kids dig in soil and at Cornucopia?

EPA has not reviewed any data from this portion of the campus – therefore we are not in a position to comment on potential levels of contamination at Cornucopia.
Steve A: we have no data, we cannot make any conclusion **CORNUCOPIA TO BE PART OF NEW TESTING?**

If this portion of the campus is included in the long-term sampling & analysis plan – then it will be part of the additional testing regime.

2:24:05 What does a soil testing of the entire property look like?
Tom (DTSC): We have not seen anything in the soil that is an acute threat. Nothing higher than 1.04ppm for PCBs.

SO WE DON'T TEST ENTIRE PROPERTY?

Tom Cota – Calif. Department of Toxic Substances Control issue.

2:34:10 If the PCBs levels are "safe" why are we having so many health conditions? (This will be redirected to Public Health Department) **HOW DO WE COMPARE TO ANY OTHER SCHOOL POPULATION? ARE THERE SUCH STUDIES?**

The vast majority of health conditions – particularly chronic health conditions like cancer – are influenced by many factors. EPA considers these health conditions to be multi-factorial in nature. The concentrations of PCBs found from the limited & preliminary airborne sampling & analysis to date, remain below the concentrations that EPA has associated with the development of cancer.

2:44:00 Process?
EPA promises a one week turn around to approve a pre-vetted testing plan. Interview for environmental Engineering firms to be early January. EEF will create a testing plan, then submit to EPA. Testing occurs quickly, approx 2 week lab turn around, then EEF will crunch data. Takes EEF about 20-30 days to do a summary report, during this time, the EPA will look at raw data. As per DTSC, soil sample and gas takes 1 day. The analytical time for lab is longest, 2-3 weeks. Tom Cota, DTSC says cleanup needs to happen when kids are not present.
WHEN IS THERE SUCH A TIME?

2:57:40 We have all read about what has gone on in NY. The concern is cleaning the schools in NY did not reduce the airborne PCBs. PCBs were absorbed into other materials around it, like the particle board and drywall. These schools now ventilate the air every day, removing toxins from the air. **WOULD THIS BE ACCEPTABLE TO MALIBU?**

Ventilation is necessary in certain classrooms in New York because these rooms continue to suffer with elevated PCB concentrations which remain above EPA's health-based guideline for schools. These rooms have had the primary source (caulk, paint, mastic, etc) of PCBs removed - yet continue to demonstrate levels of PCBs above the Agency's health-based guidelines. We have not observed this level of contamination in air nor caulk at Malibu High School based upon the current, albeit limited,

dataset.

03:00:45 Can you explain the outdoor background air vs. indoor air? EPA: sometimes the outdoor air contains elevated toxins that are over the 1 in 1M target. We do not know the levels in Malibu. This is the nature of our environment. **WILL WE TEST MALIBU 'TYPICAL' LEVELS?**

EPA has observed anthropogenic background concentrations of PCBs in outdoor or ambient air within the same order of magnitude as the concentration of PCBs that is equivalent to a 1 in a million excess risk of developing cancer. 0.004 ugPCB/m3 of air is roughly equivalent to a 1 in 1 million excess cancer risk under long-term & residential type exposure scenarios. 0.003 ugPCB/m3 of air has been measured in ambient or background urban air samples in the US. The Agency will request an outdoor air or ambient air sample to be included in the expanded sampling & analysis plan.

Unfortunately, in the United States a number of chemical contaminants are present at background concentrations which either exceed or are roughly equivalent to a 1 in 1 million excess risk of developing cancer.

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